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UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

ORACLE USA, INC., a Colorado corporation;  
ORACLE AMERICA, INC., a Delaware  
corporation; and ORACLE INTERNATIONAL  
CORPORATION, a California corporation,

Plaintiffs,

v.

RIMINI STREET, INC., a Nevada corporation;  
SETH RAVIN, an individual,

Defendants.

Case No 2:10-cv-0106-LRH-PAL

**PLAINTIFFS ORACLE USA, INC.,  
ORACLE AMERICA, INC., AND  
ORACLE INTERNATIONAL  
CORPORATION'S MOTION TO  
SEAL EXHIBIT B TO JOINT CASE  
MANAGEMENT CONFERENCE  
STATEMENT**

1 **PLAINTIFFS' MOTION TO SEAL**

2 Pursuant to the Stipulated Protective Order governing confidentiality of documents  
 3 entered by the Court on May 21, 2010 [Docket No. 55] ("Protective Order") and Rules 5.2 and  
 4 26(c) of the Federal Rules of Civil Procedure, Plaintiffs Oracle USA, Inc., Oracle America, Inc.  
 5 and Oracle International Corporation (together "Oracle" or "Plaintiffs") respectfully request that  
 6 the Court order the Clerk of the Court to file under seal Exhibit B to the Joint Case Management  
 7 Conference Statement ("Exhibit B"). Exhibit B was lodged under seal with the Court on March  
 8 25, 2011 [Docket #129].

9 Sealing Exhibit B is requested because the document contains information designated by  
 10 Defendants Rimini Street, Inc. ("Rimini") and Seth Ravin ("Ravin") as "Confidential" under the  
 11 terms of the Protective Order. The requested relief is necessary and narrowly tailored to protect  
 12 the confidentiality of the commercially sensitive business information identified by Rimini and  
 13 Ravin. The Protective Order provides that: "Counsel for any Designating Party may designate  
 14 any Discovery Material as 'Confidential Information' or 'Highly Confidential Information -  
 15 Attorneys' Eyes Only' under the terms of this Protective Order **only if such counsel in good**  
 16 **faith believes that such Discovery Material contains such information and is subject to**  
 17 **protection under Federal Rule of Civil Procedure 26(c).** The designation by any Designating  
 18 Party of any Discovery Material as 'Confidential Information' or 'Highly Confidential  
 19 Information – Attorneys' Eyes Only' shall constitute a representation that an attorney for the  
 20 Designating Party reasonably believes there is a valid basis for such designation." Protective  
 21 Order ¶ 2 (emphasis added).

22 Thus, in identifying Exhibit B as "Confidential," the designating parties have represented  
 23 that good cause exists for sealing Exhibit B. This is a sufficient showing of good cause to permit  
 24 a sealing order on a non-dispositive motion. *See, e.g., Pacific Gas and Elec. Co. v. Lynch*, 216 F.  
 25 Supp. 2d 1016, 1027 (N.D. Cal. 2002).

26 The entirety of Exhibit B has been designated as Confidential by Rimini and Ravin. The  
 27 parties have submitted all other materials in the Case Management Conference Statement for  
 28 filing in the Court's public files, which would allow public access to the filings except for those

1 portions containing information designated as Confidential. Accordingly, the request to seal is  
2 narrowly tailored.

3 For the foregoing reasons, Oracle respectfully requests that the Court find that good cause  
4 exists to file under seal Exhibit B.

5  
6 DATED: March 25, 2011

BOIES SCHILLER & FLEXNER LLP

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8 By: /s/ Kieran P. Ringgenberg  
9 Kieran P. Ringgenberg  
10 Attorneys for Plaintiffs  
11 Oracle USA, Inc., Oracle America, Inc.,  
12 and Oracle International Corp.  
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 Corp.

UNITED STATES DISTRICT COURT  
 DISTRICT OF NEVADA

ORACLE USA, INC., a Colorado corporation;  
 ORACLE AMERICA, INC., a Delaware  
 corporation; and ORACLE INTERNATIONAL  
 CORPORATION, a California corporation,

Plaintiffs,

v.

RIMINI STREET, INC., a Nevada corporation;  
 SETH RAVIN, an individual,

Defendants.

Case No 2:10-cv-0106-LRH-PAL

**[PROPOSED] ORDER GRANTING  
 PLAINTIFFS ORACLE USA, INC.,  
 ORACLE AMERICA, INC., AND  
 ORACLE INTERNATIONAL  
 CORPORATION'S MOTION TO  
 SEAL REPLY IN SUPPORT OF  
 MOTION FOR PRESERVATION  
 ORDER**

**[PROPOSED] ORDER**

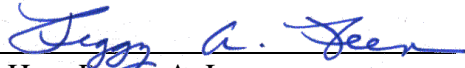
Pending before this Court is Plaintiffs Oracle USA, Inc., Oracle America, Inc. and Oracle International Corporation (together "Oracle" or "Plaintiffs") Motion to Seal Exhibit B to the Joint Case Management Conference Statement [Docket #130]. Federal Rule of Civil Procedure 26(c) provides broad discretion for a trial court to permit sealing of court documents for, inter alia, the protection of "a trade secret or other confidential research, development, or commercial information." Fed. R. Civ. P. 26(c). Having considered Plaintiffs' Motion to Seal, compelling reasons having been shown and good cause existing:

IT IS HEREBY ORDERED THAT: Plaintiffs' Motion to Seal is GRANTED.

The Clerk of the Court shall file under seal the Exhibit B to the Joint Case Management Conference Statement.

IT IS SO ORDERED.

DATED: March 29, 2011

By:   
Hon. Peggy A. Leen  
United States Magistrate Judge